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Of Proposed Attorneys for Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

15005 NW Cornell LLC; and
Vahan M. Dinihanian, Jr.,

Debtors.

Bankruptcy Case Nos.:

19-31883-dwh11 (Lead Case)

19-31886-dwh11

Jointly Administered Under
Case No. 19-31883-dwh11

STATEMENT OF VAHAN M.
DINIHANIAN, JR. IN ADVANCE OF
CASE MANAGEMENT CONFERENCE

Debtor-in-Possession, Vahan Dinihanian, Jr. (the "Debtor"), submits this report in advance of the Case Management Conference scheduled for June 18, 2019, at 2:30 p.m. In anticipation of the topics to be discussed, the Debtor submits the following:

1. Debtor's Business Operations and Cash Flow Analysis.

The Debtor is an individual who owns and operates multiple business entities, including several entities that own and lease commercial real estate, a floral products business, and entities that provide engineering and consulting services. The Debtor anticipates his monthly income

and expenses for the upcoming 120-day period to correspond to the Schedules I & J filed by the Debtor in this case.

2. Motion for Relief from Stay.

No motions for relief have been filed, and none are anticipated in the foreseeable future.

3. Leases / Executory Contracts.

Debtor leases a portion of his personal residence (barns, shop, outbuildings, etc.) to Eagle Holdings, LLC, one of the Debtor's affiliates, which uses the property to conduct business activities. The lease arrangement is an informal month-to-month lease, which the Debtor anticipates continuing.

4. Prepetition Taxes / Historical Financial Information for the Past Three Years.

Attached as Exhibit A is a summary of the Debtor's historical financial information for the three years prior to the Petition. The Debtor's income is not seasonal, so the summary was prepared on a year-by-year basis.

5. Statement of Income and Expenses since the Filing of the Petition.

Debtor's income from and expenses since the filing of the Petition consist solely of personal living and household expenses that were incurred in the ordinary course of Debtor's business. Such expenses include fuel for vehicles, groceries, utilities, etc. Debtor asserts that the income and expenses incurred since the filing of the petition have been consistent with the income and expenses listed in Schedules I and J, filed herein.

6. Employment of Professionals and Estimate of Professional Fees.

As of the date hereof, the Debtor has applied for the authority to employ the law firm of Motschenbacher & Blattner, LLP as general bankruptcy counsel. In the near future, Debtor will

be applying for authority to employ an accountant. A monthly budget for these professionals is attached as Exhibit B. Estimated professional fees are as follows:

Estimated Professional Fees:

Motschenbacher & Blattner, LLP	\$100,000
Accountant – Delap, LLP	\$3,000

These budgets are based on good faith estimates and no assurance can be given that the actual amounts will not exceed the estimates. All professionals reserve the right to amend their budgets or apply for professional fees and/or expenses in excess of the budgeted amounts.

Dated: June 14, 2019.

MOTSCHENBACHER & BLATTNER, LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB No. 074027
Of Attorneys for Debtor

EXHIBIT A
DEBTOR'S HISTORIC FINANCIAL INFORMATION

	2017	2018	YTD 2019
Gross Income	(-334,977)	Currently Unknown – Debtor's Taxes are to be prepared upon employment of accountant	\$100,000 (Estimated aggregate gross income for multiple business entities, without deductions for expenses)

EXHIBIT B
PROFESSIONAL FEE ESTIMATES

Professional	June 2019	July 2019	August 2019	September 2019	October 2019	November 2019	Totals
Motschenbacher & Blattner LLP	\$25,000	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000	\$100,000
Delap, LLP	\$0	\$0	\$0	\$5,000	\$0	\$0	\$5,000

In re: 15005 NW Cornell LLC
Case No. 19-31883-dwh11 (Lead Case); and
In re: Vahan M. Dinihanian, Jr.
Case No. 19-31886-dwh11 (Jointly Administered)

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below the foregoing STATEMENT OF VAHAN M. DINIHANIAN, JR. IN ADVANCE OF CASE MANAGEMENT CONFERENCE was served electronically on the following CM/ECF participants registered to receive notice in the above-referenced cases:

- STEPHEN P ARNOT steve.arnot@usdoj.gov
- ELEANOR A. DUBAY edubay@tomasilegal.com, jramig@tomasilegal.com
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- US Trustee, Portland USTPRegion18.PL.ECF@usdoj.gov

I further certify that on the date set forth below, the foregoing document was served via first-class mail, postage prepaid, on the following parties:

NONE

Dated: June 14, 2019

/s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB No. 074027
Attorney For Debtor Vahan M. Dinihanian, Jr.